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11 GODADDY INC. and GODADDY.COM, LLC

12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 BEST HIRES L.L.C., a Nevada Limited-
16 Liability Company,

17 Plaintiff,

18 v.

19 GODADDY INC., a Delaware Corporation;
20 GODADDY.COM, LLC, a Delaware
Corporation; DOE Individuals I through X,

21 Defendant.

Case No.: 2:18-cv-00148-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND
TO MOTION FOR
PRELIMINARY INJUNCTION**

(First Request)

1 Pursuant to LR IA 6-1(a), Plaintiff Best Hires L.L.C. (“Plaintiff”) and Defendants
2 GoDaddy Inc. and GoDaddy.com, LLC (collectively “GoDaddy”), by and through their
3 respective counsel, hereby stipulate and agree to extend the time for GoDaddy to respond to
4 Plaintiff’s Motion for Preliminary Injunction (Dkt. No. 6) (the “Motion”). Plaintiff filed the
5 Motion on or about February 9, 2018, and served GoDaddy with its Complaint and the Motion
6 on or about February 12, 2018. GoDaddy’s Opposition to Plaintiff’s Motion is presently due
7 on February 26, 2018, and Plaintiff and GoDaddy hereby stipulate and agree to extend this
8 deadline to March 5, 2018. In support of this request, Plaintiff and GoDaddy stipulate as
9 follows:

10 1. On or about January 26, 2018, Plaintiff filed its Complaint (Dkt. No. 1) and Ex
11 Parte Application for Temporary Restraining Order and Motion for Hearing on Preliminary
12 Injunction (Dkt. No. 3).

13 2. On or about January 29, 2018, the Court issued an Order Denying Motions for
14 Injunctive Relief Without Prejudice (Dkt. No. 5).

15 3. On or about February 9, 2018, Plaintiff filed the Motion.

16 4. On or about February 12, 2018, Plaintiff served GoDaddy with its Complaint
17 and the Motion.

18 5. GoDaddy’s Opposition to the Motion is presently due on February 26, 2018.

19 6. Counsel for GoDaddy and counsel for Plaintiff have been engaged in informal
20 discussions in an attempt to resolve this dispute, and wish to continue those discussions.

21 7. Plaintiff and GoDaddy have agreed to extend the deadline for GoDaddy to
22 respond to the Motion to March 5, 2018.

23 8. This stipulation is the parties’ first request to extend the deadline for GoDaddy
24 to respond to the Motion.

25 9. This stipulation is made in good faith, supported by good cause, and is not an
26 attempt to delay any proceedings.

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1 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
2 HEREBY STIPULATED AND AGREED, by and between the parties, that GoDaddy shall
3 have until March 5, 2018 to respond to the Motion.

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5 DATED this 23rd day of February, 2018

DATED this 23rd day of February, 2018

6 By: /s/ Gilbert S. Hernandez
7 Gilbert S. Hernandez, Esq.
8 NV Bar No. 11153
9 Paula L. Zecchini (*pro hac vice*
10 pending)
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11 *Attorneys for Defendants GoDaddy Inc.*
12 *and GoDaddy.com, LLC*

Attorneys for Plaintiff Best Hires L.L.C.

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15 **IT IS SO ORDERED:**

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UNITED STATES DISTRICT COURT JUDGE

18 DATED: 2/23/2018
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